

EXHIBIT 22

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10 *Attorneys for Defendant*
Otto Trucking LLC
11

12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

15 WAYMO LLC,

16 Plaintiff,

17 v.

18 UBER TECHNOLOGIES, INC.;
19 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

20 Defendants.
21

Case No. 3:17-cv-00939

**DEFENDANT OTTO TRUCKING LLC'S
INITIAL DISCLOSURES PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE
26(a)(1)**

Trial Date: October 10, 2017

22
23 Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendant Otto Trucking
24 LLC ("Otto Trucking") hereby provides the following initial disclosures to Plaintiff Waymo LLC
25 ("Waymo") based on information that is reasonably available to Otto Trucking at this time and at
26 this stage of the proceedings. As such, the individuals and documents disclosed herein are not
27 necessarily exhaustive of whom and what Otto Trucking may identify as discovery progresses. As
28 additional information becomes available, Otto Trucking reserves the right to supplement these

1 initial disclosures and/or use documents not described herein. By making these disclosures, Otto
 2 Trucking does not admit that any subject matter identified with respect to any particular individual
 3 or category of documents is relevant to this matter, nor likely to lead to the discovery of admissible
 4 evidence. These disclosures are made without prejudice or waiver of any right to modify or
 5 supplement the present disclosures or to present any evidence or witness at trial, object to any
 6 witnesses or the admissibility of any evidence, and/or take discovery in accordance with the Federal
 7 Rules of Civil Procedure. Otto Trucking does not waive the right to object to producing any
 8 document or thing on the basis of any applicable privilege or immunity, relevancy, undue burden, or
 9 any other valid objections.
 10

11 **A. PERSONS LIKELY TO HAVE DISCOVERABLE INFORMATION (Fed. R. Civ.**
 12 **P. 26(a)(1)(A)(i))**

13 Pursuant to Rule 26(a)(1)(A)(i), Otto Trucking identifies the following individuals known to
 14 it at this time who are likely to have discoverable, non-privileged information that Otto Trucking
 15 may use to support its defenses, and for each individual, Otto Trucking identifies the subject of the
 16 information. Otto Trucking objects to Waymo contacting any individuals currently or formerly
 17 associated with Otto Trucking. All contact for such individuals should be made through counsel for
 18 Otto Trucking, Goodwin Procter LLP. Otto Trucking also does not waive its right to object to
 19 discovery of information from any such individuals on the basis of attorney-client privilege, work
 20 product immunity, or any other applicable privilege or immunity.
 21

- 22 1. **James Haslim**— Contact through counsel for Uber – Mr. Haslim is a Senior
 23 Manager, Engineering for the Advanced Technologies Group at Uber Technologies,
 24 Inc. (“Uber”) and is responsible for the technical development of Uber’s LiDAR
 25 sensors. He was previously associated with Tyto LiDAR LLC (“Tyto LiDAR”) and
 26 Ottomotto LLC (“Ottomotto”) during which time he was tasked with leading the team
 27 at Ottomotto in developing a light detecting and ranging (“LiDAR”) solution for
 28

1 autonomous trucks. Mr. Haslim is knowledgeable about the development of LiDAR
2 technologies at Tyto LiDAR, Ottomotto, and Uber, and also has technical knowledge
3 regarding LiDAR, including aspects of LiDAR design, specifications,
4 implementation, and limitations. Further and upon information and belief, Mr.
5 Haslim is knowledgeable about business or corporate aspects of Tyto LiDAR and
6 Ottomotto, including but not limited to its structure and aspects of Ottomotto's
7 acquisition of Tyto LiDAR.
8

9 2. **Eric Meyhofer**— Contact through counsel for Uber – Mr. Meyhofer is the Head of
10 the Advanced Technologies Group at Uber. Previously, he was the Director of
11 Engineering at Uber and Co-Founder of Carnegie Robotics LLC. Mr. Meyhofer is
12 knowledgeable about the development of LiDAR technologies at Uber, and also has
13 technical knowledge regarding LiDAR, including aspects of LiDAR design,
14 specifications, implementation, and limitations.
15

16 3. **Scott Boehmke**— Contact through counsel for Uber – Mr. Boehmke is a Robotics
17 Engineer at the Advanced Technologies Group at Uber and leads aspects of Uber's
18 development of LiDAR technologies. As such Mr. Boehmke is knowledgeable about
19 the development of LiDAR technologies at Uber, and also has technical knowledge
20 regarding LiDAR, including aspects of LiDAR design, specifications,
21 implementation, and limitations.
22

23 4. **Gaetan Pennecot**— Contact through counsel for Uber – Mr. Pennecot is an engineer
24 at the Advanced Technologies Group at Uber. He was previously associated with
25 Google/Waymo and 510 Systems including during the period Google acquired 510
26 Systems. Mr. Pennecot is knowledgeable about the development of LiDAR
27 technologies at Google/Waymo, 510 Systems, and Uber, and also has technical
28 knowledge regarding LiDAR, including aspects of LiDAR design, specifications,

1 implementation, and limitations. Further and upon information and belief, Mr.
2 Pennecot is knowledgeable about business or corporate aspects of 510 Systems and
3 Google/Waymo, including but not limited to its structure and aspects of Google's
4 acquisition of 510 Systems. Mr. Pennecot is knowledgeable about aspects of
5 personnel and staffing at Google's and Waymo's autonomous driving projects
6 including but not limited to knowledge of bonus compensation plans and milestones.
7 Mr. Pennecot is knowledgeable about policies, procedures, and guidelines at Google
8 and Waymo pertaining to the treatment of confidential or proprietary information
9 such as, but not limited to, encryption, data recovery, data logging, intrusion,
10 software, hardware, and the operation of servers, networks, or electronic devices
11 including the SVN network and Tortoise SVN.
12

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- 14 5. **Daniel Gruver**— Contact through counsel for Uber – Mr. Gruver is Engineer and
15 Program Manager at the Advanced Technologies Group at Uber. He was previously
16 associated with 510 Systems, Google/Waymo, and Ottomotto including during the
17 periods Google acquired 510 Systems and Uber acquired Ottomotto. Mr. Gruver is
18 knowledgeable about the development of LiDAR technologies at 510 Systems,
19 Google/Waymo, Ottomotto, and Uber, and also has technical knowledge regarding
20 LiDAR, including aspects of LiDAR design, specifications, implementation, and
21 limitations. Further and upon information and belief, Mr. Gruver is knowledgeable
22 about business or corporate aspects of 510 Systems, Google/Waymo, Ottomotto, and
23 Uber, including but not limited to its structure and aspects of Google's acquisition of
24 510 Systems and Uber's acquisition of Ottomotto. Mr. Gruver is knowledgeable
25 about aspects of personnel and staffing at Google's and Waymo's autonomous
26 driving projects including but not limited to knowledge of bonus compensation plans
27 and milestones. Mr. Gruver is knowledgeable about policies, procedures, and
28

1 guidelines at Google and Waymo pertaining to the treatment of confidential or
2 proprietary information such as, but not limited to, encryption, data recovery, data
3 logging, intrusion, software, hardware, and the operation of servers, networks, or
4 electronic devices including the SVN network and Tortoise SVN.
5

6 6. **Kevin Faulkner**—Mr. Faulkner is Managing Director and head of the New York
7 digital forensics lab at Stroz Friedberg LLC (“Stroz Friedberg”). Mr. Faulkner is
8 knowledgeable about Stroz Friedberg’s forensic investigation and analysis of
9 computers, smartphones, or other electronic devices referenced in the claims and
10 defenses in this case, including Stroz Friedberg’s factual investigations and
11 impressions or conclusions drawn therefrom. Further, Mr. Faulkner is knowledgeable
12 about policies, procedures, and guidelines regarding Stroz Friedberg’s investigation.
13

14 7. **Rhian Morgan**— Contact through counsel for Otto Trucking and/or Uber – Ms.
15 Morgan is an employee of Uber, and was previously associated with Ottomotto and
16 Otto Trucking LLC (“Otto Trucking”) as a lead for human resources. Ms. Morgan is
17 knowledgeable about aspects of human resources at Ottomotto and Otto Trucking,
18 including recruitment, hiring, on-boarding of new employees, and implementing
19 related company policies. Further, Ms. Morgan is knowledgeable about the corporate
20 policies, procedures, and guidelines regarding employees at Ottomotto and Otto
21 Trucking, including corporate non-solicitation policies and treatment of proprietary
22 information from other employment. Further and upon information and belief, Ms.
23 Morgan is knowledgeable about business or corporate aspects of Ottomotto and Otto
24 Trucking, including but not limited to its structure.
25

26 8. **Anthony Levandowski**— contract through Ismail Ramsey and Miles Ehrlich,
27 Ramsey & Ehrlich LLP, 803 Hearst Ave, Berkeley, CA 94710, 510-548-3600 – Mr.
28 Levandowski is a Managing Member of Otto Trucking. He was previously

1 associated with 510 Systems, Ottomotto, Google/Waymo, and Uber. Given Mr.
2 Levandowski's invocation of his Fifth Amendment rights, Otto Trucking does not
3 anticipate that he will testify.

4
5 9. **Sameer Kshirsagar**— contact through counsel for Uber – Mr. Kshirsagar is Director
6 of Global Product Operations for the Advanced Technologies Group at Uber. He
7 previously served the same function for Ottomotto and Otto Trucking prior to Uber's
8 acquisition of Ottomotto. In addition, Mr. Kshirsagar was previously Manufacturing
9 Engineer and Global Supply Manager at the Self-Driving Car division at Google. Mr.
10 Kshirsagar is knowledgeable about the development of LiDAR technologies at
11 Ottomotto and Uber, and also has technical knowledge regarding LiDAR, including
12 aspects of LiDAR design, specifications, implementation, and limitations. Mr.
13 Kshirsagar is knowledgeable about the policies or procedures regarding the treatment
14 of proprietary or confidential information at Google/Waymo, Ottomotto, Otto
15 Trucking, and Uber.
16

17 10. **Radu Raduta**— Mr. Raduta was previously associated with Ottomotto and was also
18 a mechanical engineer at Google/Waymo. Mr. Raduta is knowledgeable about the
19 development of LiDAR technologies at Ottomotto and Uber, and also has technical
20 knowledge regarding LiDAR, including aspects of LiDAR design, specifications,
21 implementation, and limitations. Mr. Raduta is knowledgeable about the policies or
22 procedures regarding the treatment of proprietary or confidential information at
23 Google/Waymo, Ottomotto, Otto Trucking, and Uber. Mr. Raduta is knowledgeable
24 about aspects of personnel and staffing at Google's and Waymo's autonomous
25 driving projects including but not limited to knowledge of bonus compensation plans
26 and milestones. Mr. Raduta is knowledgeable about policies, procedures, and
27 guidelines at Google and Waymo pertaining to the treatment of confidential or
28

1 proprietary information such as, but not limited to, encryption, data recovery, data
2 logging, intrusion, software, hardware, and the operation of servers, networks, or
3 electronic devices including the SVN network and Tortoise SVN.

4
5 11. **David Meall**— contact through counsel for Uber – Mr. Meall is Senior Recruiting
6 Manager of the Advanced Technologies Group at Uber. Mr. Meall is knowledgeable
7 about aspects of human resources at the Advanced Technologies Group related to,
8 among other things, recruitment, hiring, and on-boarding of new employees, and
9 implementing the Advanced Technologies Group’s related company policies. Mr.
10 Meall is also knowledgeable about employee personnel files, including the forms that
11 document recruiting and hiring processes at the Advanced Technologies Group.
12 Further, Mr. Meall is knowledgeable about the corporate policies, procedures, and
13 guidelines regarding employees at Uber, including corporate non-solicitation policies
14 and treatment of proprietary information from other employment.
15

16 12. **Asheem Linaval**— contact through counsel for Uber – Mr. Linaval is an electrical
17 engineer at Uber. He was previously associated with 280 Systems, Inc., Ottomotto,
18 and Adecco working on Google’s autonomous driving projects. Mr. Linaval is
19 knowledgeable about the development of LiDAR technologies at 280 Systems,
20 Ottomotto, Google/Waymo, and Uber, and also has technical knowledge regarding
21 LiDAR, including aspects of LiDAR design, specifications, implementation, and
22 limitations. Mr. Linaval is knowledgeable about the policies or procedures regarding
23 the treatment of proprietary or confidential information at Google/Waymo,
24 Ottomotto, and Uber. Mr. Linaval is knowledgeable about aspects of personnel and
25 staffing at Google’s and Waymo’s autonomous driving projects including but not
26 limited to knowledge of bonus compensation plans and milestones. Mr. Linaval is
27 knowledgeable about policies, procedures, and guidelines at Google and Waymo
28

1 pertaining to the treatment of confidential or proprietary information such as, but not
2 limited to, encryption, data recovery, data logging, intrusion, software, hardware, and
3 the operation of servers, networks, or electronic devices including the SVN network
4 and Tortoise SVN.

5
6 13. **Daniel Chu**— contact through counsel for Waymo – Mr. Chu is a part of the product
7 management team at Waymo. Upon information and belief, Mr. Chu assists with
8 product strategy and aids Waymo engineers in prioritization of work in the
9 development of autonomous technologies. Mr. Chu is knowledgeable about business
10 or corporate aspects of Waymo’s autonomous driving technology, including
11 strategies, developments, market research and competitor analysis pertaining to
12 LiDAR technologies.

13
14 14. **Pierre-Yves Droz**— contact through counsel for Waymo – Mr. Droz is Principal
15 Hardware Engineer at Waymo and has been the technical lead on Waymo’s LiDAR
16 project since its inception. Mr. Droz co-founded 510 Systems in which his role
17 included, among other things, principal responsibility for research and development
18 and eventual development of 510 Systems’ in-house LiDAR technologies. Mr. Droz
19 is knowledgeable about the development of LiDAR technologies at 510 Systems and
20 Google/Waymo, and also has technical knowledge regarding LiDAR, including
21 aspects of LiDAR design, specifications, implementation, and limitations. Further
22 and upon information and belief, Mr. Droz is knowledgeable about business or
23 corporate aspects of 510 Systems and Google/Waymo, including but not limited to its
24 structure and aspects of Google’s acquisition of 510 Systems.

25
26 15. **Ron Medford**— contact through counsel for Waymo – Mr. Medford is Director of
27 Safety of the Self-Driving Car Program at Google for which, among other
28 responsibilities, he provides safety assessments for analysis related to the design and

1 performance of autonomous vehicles. Mr. Medford is knowledgeable about
2 Google/Waymo's autonomous driving applications in jurisdictions both within and
3 outside of California. Mr. Medford is also knowledgeable about public policy,
4 regulatory work, and safety matters related to autonomous vehicles.
5

6 16. **William Grossman**— contact through counsel for Waymo – Mr. Grossman is a
7 mechanical engineer at Waymo. He is knowledgeable about facts pertaining to the
8 claims or defenses in this case relating to Waymo's allegations of trade secret
9 misappropriation.

10 17. **Gary Brown**— contact through counsel for Waymo – Mr. Brown is Security
11 Engineer, Forensics at Google. He is knowledgeable about Google's forensic
12 investigation and analysis of computers, smartphones, or other electronic devices
13 referenced in the claims and defenses in this case, including the factual investigations
14 and impressions or conclusions drawn therefrom. Mr. Brown is knowledgeable about
15 policies, procedures, and guidelines at Google and as they pertain to the
16 aforementioned investigation. Mr. Brown is knowledgeable about policies,
17 procedures, and guidelines at Google pertaining to the treatment of confidential or
18 proprietary information such as, but not limited to, encryption, data recovery, data
19 logging, intrusion, security software, security hardware, and the operation of
20 Google's servers, networks, or electronic devices including the SVN network and
21 Tortoise SVN.
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23
24 18. **Kristinn Gudjonsson**— contact through counsel for Waymo — Mr. Gudjonsson is a
25 security engineer at Google. He is knowledgeable about Google's forensic
26 investigation and analysis of computers, smartphones, or other electronic devices
27 referenced in the claims and defenses in this case, including the factual investigations
28 and impressions or conclusions drawn therefrom. Further, Mr. Gudjonsson is

1 knowledgeable about policies, procedures, and guidelines at Google and as they
2 pertain to the aforementioned investigation. Mr. Gudjonsson is knowledgeable about
3 policies, procedures, and guidelines at Google pertaining to the treatment of
4 confidential or proprietary information such as, but not limited to, encryption, data
5 recovery, data logging, intrusion, software, hardware, and the operation of Google's
6 servers, networks, or electronic devices including the SVN network and Tortoise
7 SVN.
8

9 19. **Tim Willis**— contact through counsel for Waymo – Mr. Willis is Director of Supply
10 Chain Operations at Waymo. Upon information and belief, Mr. Willis is
11 knowledgeable about various aspects of supply chain operations at Waymo, including
12 but not limited to sourcing, procurement, and contracts with third parties in support of
13 Waymo's autonomous driving technologies. In addition, Mr. Willis is knowledgeable
14 about the circumstances relevant to claims or defenses pertaining to Waymo's trade
15 secret misappropriation allegations. Mr. Willis is knowledgeable about the policies
16 or procedures regarding the treatment of proprietary or confidential information at
17 Waymo.
18

19 20. **Michael Janosko**— contact through counsel for Waymo – Mr. Janosko is a security
20 engineering manager at Google. Mr. Janosko is knowledgeable about policies,
21 procedures, and guidelines at Google pertaining to the treatment of confidential or
22 proprietary information such as, but not limited to, encryption, data recovery, data
23 logging, intrusion, security software, security hardware, and the operation of
24 Google's servers, networks, or electronic devices including the SVN network and
25 Tortoise SVN.
26

27 21. **Sasha Zbrozec**— contact through counsel for Waymo – Mr. Zbrozec is Staff
28 Hardware Engineer at Waymo. Mr. Zbrozec is knowledgeable about policies,

1 procedures, and guidelines at Google pertaining to the treatment of confidential or
2 proprietary information such as, but not limited to, encryption, data recovery, data
3 logging, intrusion, security software, security hardware, and the operation of
4 Google's servers, networks, or electronic devices including the SVN network and
5 Tortoise SVN.
6

7 22. **John Bares**— contact through counsel for Uber – Mr. Bares is Operations Director at
8 the Advanced Technologies Group at Uber. He was previously the founder of
9 Carnegie Robotics LLC. Mr. Bares is knowledgeable about the development of
10 LiDAR technologies at Uber, and also has technical knowledge regarding LiDAR,
11 including aspects of LiDAR design, specifications, implementation, and limitations.
12

13 23. **Cameron Poetzscher**— contact through counsel for Uber – Mr. Poetzcher is Vice
14 President of Corporate Development at Uber. Mr. Poetzcher is knowledgeable about
15 the development, strategic vision, designs, and projects of Uber's autonomous car
16 program during time period most relevant to claims. Further and upon information
17 and belief, Mr. Poetzcher is knowledgeable about business or corporate aspects of
18 Uber, including but not limited to its structure and aspects of discussions,
19 negotiations, and considerations involving Uber's acquisition of Ottomotto and Otto
20 Trucking.
21

22 24. **John Gardner**—Merri Baldwin, Rogers Joseph O'Donnell P.C., 311 California St,
23 San Francisco, CA 94104, 415-956-2828 – Mr. Gardner is Partner at the law firm
24 Donahue Fitzgerald LLP. He is knowledgeable about representation pertaining to
25 Anthony Levandowski in the course of Uber's corporate transaction with Ottomotto
26 and Otto Trucking. Discovery will involve some privileged documents and
27 conversations.
28

1 25. **Velodyne LiDAR**— 345 Digital Dr, Morgan Hill, CA 95037, 408-465-2800 –

2 Velodyne LiDAR (“Velodyne”) is a technology company that designs and
3 manufactures LiDAR systems for use in, among other things, autonomous driving
4 vehicles. Velodyne is knowledgeable about negotiations, discussions, deliberations,
5 and contracts regarding LiDAR technology as they pertain to the parties in this
6 litigation. Further, Velodyne has technical knowledge regarding LiDAR, including
7 aspects of LiDAR design, specifications, implementation, and limitations.
8

9 26. **Eric Berdinis**—Mr. Berdinis is associated with Otto Trucking. Upon information
10 and belief, Mr. Berdinis may have knowledge regarding claims or defenses pertaining
11 to Otto Trucking in this case. Mr. Berdinis is knowledgeable about aspects of
12 personnel and staffing at Google’s and Waymo’s autonomous driving projects
13 including but not limited to knowledge of bonus compensation plans and milestones.
14 Mr. Berdinis is knowledgeable about policies, procedures, and guidelines at Google
15 and Waymo pertaining to the treatment of confidential or proprietary information
16 such as, but not limited to, encryption, data recovery, data logging, intrusion,
17 software, hardware, and the operation of servers, networks, or electronic devices
18 including the SVN network and Tortoise SVN.
19

20 27. **Don Burnette**— contact through counsel at Uber – Mr. Burnette is Technical Lead at
21 Uber. He was previously associated with Ottomotto and Google. Mr. Burnette is
22 knowledgeable about the development of LiDAR technologies at Ottomotto, Google,
23 and Uber, and also has technical knowledge regarding LiDAR, including aspects of
24 LiDAR design, specifications, implementation, and limitations. Further and upon
25 information and belief, Mr. Burnette is knowledgeable about business or corporate
26 aspects of Ottomotto, including but not limited to its structure and aspects of Uber’s
27 acquisition of Ottomotto. Mr. Burnette is knowledgeable about aspects of personnel
28

1 and staffing at Google's and Waymo's autonomous driving projects including but not
2 limited to knowledge of bonus compensation plans and milestones. Mr. Burnette is
3 knowledgeable about policies, procedures, and guidelines at Google and Waymo
4 pertaining to the treatment of confidential or proprietary information such as, but not
5 limited to, encryption, data recovery, data logging, intrusion, software, hardware, and
6 the operation of servers, networks, or electronic devices including the SVN network
7 and Tortoise SVN.

9 28. **Claire Delaunay**— contact through counsel at Uber — Ms. Delaunay is Director of
10 Engineering at Uber. She was previously associated with Ottomotto and Google.
11 Ms. Delaunay is knowledgeable about the development of LiDAR technologies at
12 Ottomotto, Google, and Uber, and also has technical knowledge regarding LiDAR,
13 including aspects of LiDAR design, specifications, implementation, and limitations.
14 Further and upon information and belief, Ms. Delaunay is knowledgeable about
15 business or corporate aspects of Ottomotto, including but not limited to its structure
16 and aspects of Uber's acquisition of Ottomotto. Ms. Delaunay is knowledgeable
17 about aspects of personnel and staffing at Google's and Waymo's autonomous
18 driving projects including but not limited to knowledge of bonus compensation plans
19 and milestones. Ms. Delaunay is knowledgeable about policies, procedures, and
20 guidelines at Google and Waymo pertaining to the treatment of confidential or
21 proprietary information such as, but not limited to, encryption, data recovery, data
22 logging, intrusion, software, hardware, and the operation of servers, networks, or
23 electronic devices including the SVN network and Tortoise SVN.

26 29. **Ryan Espinosa**—Mr. Espinosa is associated with Otto Trucking. Upon information
27 and belief, Mr. Espinosa may have knowledge regarding claims or defenses
28 pertaining to Otto Trucking in this case. Mr. Espinosa is knowledgeable about

1 aspects of personnel and staffing at Google's and Waymo's autonomous driving
2 projects including but not limited to knowledge of bonus compensation plans and
3 milestones. Mr. Espinosa is knowledgeable about policies, procedures, and
4 guidelines at Google and Waymo pertaining to the treatment of confidential or
5 proprietary information such as, but not limited to, encryption, data recovery, data
6 logging, intrusion, software, hardware, and the operation of servers, networks, or
7 electronic devices including the SVN network and Tortoise SVN.
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9 30. **Drew Gray**—Mr. Gray is associated with Otto Trucking. Upon information and
10 belief, Mr. Gray may have knowledge regarding claims or defenses pertaining to Otto
11 Trucking in this case.
12

13 31. **Matt Grigsby**—Mr. Grigsby is associated with Otto Trucking. Upon information
14 and belief, Mr. Grigsby may have knowledge regarding claims or defenses pertaining
15 to Otto Trucking in this case.
16

17 32. **Soren Juelsgaard**— contact through counsel for Ottomotto – Mr. Juelsgaard is
18 Director of Hardware Engineering at Ottomotto. He was previously associated with
19 Google. Mr. Juelsgaard is knowledgeable about the development of LiDAR
20 technologies at Ottomotto, Google, and Uber, and also has technical knowledge
21 regarding LiDAR, including aspects of LiDAR design, specifications,
22 implementation, and limitations. Further and upon information and belief, Mr.
23 Juelsgaard is knowledgeable about business or corporate aspects of Ottomotto,
24 including but not limited to its structure and aspects of Uber's acquisition of
25 Ottomotto. Mr. Juelsgaard is knowledgeable about aspects of personnel and staffing
26 at Google's and Waymo's autonomous driving projects including but not limited to
27 knowledge of bonus compensation plans and milestones. Mr. Juelsgaard is
28 knowledgeable about policies, procedures, and guidelines at Google and Waymo

1 pertaining to the treatment of confidential or proprietary information such as, but not
2 limited to, encryption, data recovery, data logging, intrusion, software, hardware, and
3 the operation of servers, networks, or electronic devices including the SVN network
4 and Tortoise SVN.

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6 33. **Oleg Khainovski**—Mr. Khainovski is associated with Otto Trucking. Upon
7 information and belief, Mr. Khainovski may have knowledge regarding claims or
8 defenses pertaining to Otto Trucking in this case.

9 34. **Maxime Levandowski**—Mr. Levandowski is associated with Otto Trucking. Upon
10 information and belief, Mr. Levandowski may have knowledge regarding claims or
11 defenses pertaining to Otto Trucking in this case.

12 35. **Yevgeni Litvin**—Mr. Litvin is associated with Otto Trucking. Upon information and
13 belief, Mr. Litvin may have knowledge regarding claims or defenses pertaining to
14 Otto Trucking in this case.

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16 36. **Nicolas Munley**—Mr. Munley is associated with Otto Trucking. Upon information
17 and belief, Mr. Munley may have knowledge regarding claims or defenses pertaining
18 to Otto Trucking in this case. Mr. Munley is knowledgeable about aspects of
19 personnel and staffing at Google's and Waymo's autonomous driving projects
20 including but not limited to knowledge of bonus compensation plans and milestones.
21 Mr. Munley is knowledgeable about policies, procedures, and guidelines at Google
22 and Waymo pertaining to the treatment of confidential or proprietary information
23 such as, but not limited to, encryption, data recovery, data logging, intrusion,
24 software, hardware, and the operation of servers, networks, or electronic devices
25 including the SVN network and Tortoise SVN.

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27 37. **Gillian Nugent**— contact through counsel for Uber – Ms. Nugent is Operations Lead
28 at the Advanced Technologies Group at Uber. Ms. Nugent was previously is

1 associated with Ottomotto and Otto Trucking. Ms. Nugent is knowledgeable about
2 the development of LiDAR technologies at Ottomotto, and Uber, and also has
3 technical knowledge regarding LiDAR, including aspects of LiDAR design,
4 specifications, implementation, and limitations.
5

6 38. **Lior Ron**— Jonathan Patchen, Taylor & Patchen LLP, One Ferry Building, Suite
7 355, San Francisco, CA 94111, 415-788-8200 – Mr. Ron is a Managing Member of
8 Otto Trucking. He was previously associated with Ottomotto and Google.

9 39. **Wendnara Phok**—Mr. Phok is associated with Otto Trucking. Upon information
10 and belief, Mr. Phok may have knowledge regarding claims or defenses pertaining to
11 Otto Trucking in this case. Mr. Phok is knowledgeable about aspects of personnel
12 and staffing at Google's and Waymo's autonomous driving projects including but not
13 limited to knowledge of bonus compensation plans and milestones. Mr. Phok is
14 knowledgeable about policies, procedures, and guidelines at Google and Waymo
15 pertaining to the treatment of confidential or proprietary information such as, but not
16 limited to, encryption, data recovery, data logging, intrusion, software, hardware, and
17 the operation of servers, networks, or electronic devices including the SVN network
18 and Tortoise SVN.
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20 40. **Colin Sebern**— contact through counsel for Uber – Mr. Sebern is Senior Operations
21 Engineer at Uber and Vehicle Engineer at Ottomotto. He was previously associated
22 with Google. Upon information and belief, Mr. Sebern is knowledgeable about the
23 development of LiDAR technologies at Ottomotto, Google, and Uber, and also has
24 technical knowledge regarding LiDAR, including aspects of LiDAR design,
25 specifications, implementation, and limitations. Further and upon information and
26 belief, Mr. Sebern is knowledgeable about business or corporate aspects of
27 Ottomotto, including but not limited to its structure and aspects of Uber's acquisition
28

1 of Ottomotto. Mr. Sebern is knowledgeable about aspects of personnel and staffing at
2 Google's and Waymo's autonomous driving projects including but not limited to
3 knowledge of bonus compensation plans and milestones. Mr. Sebern is
4 knowledgeable about policies, procedures, and guidelines at Google and Waymo
5 pertaining to the treatment of confidential or proprietary information such as, but not
6 limited to, encryption, data recovery, data logging, intrusion, software, hardware, and
7 the operation of servers, networks, or electronic devices including the SVN network
8 and Tortoise SVN.
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10 41. **Vincent Tran**—Mr. Tran is associated with Otto Trucking. Upon information and
11 belief, Mr. Tran may have knowledge regarding claims or defenses pertaining to Otto
12 Trucking in this case. Mr. Tran is knowledgeable about aspects of personnel and
13 staffing at Google's and Waymo's autonomous driving projects including but not
14 limited to knowledge of bonus compensation plans and milestones. Mr. Tran is
15 knowledgeable about policies, procedures, and guidelines at Google and Waymo
16 pertaining to the treatment of confidential or proprietary information such as, but not
17 limited to, encryption, data recovery, data logging, intrusion, software, hardware, and
18 the operation of servers, networks, or electronic devices including the SVN network
19 and Tortoise SVN.
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22 42. **Jur Van Den Berg**—Mr. Van Den Berg is associated with Otto Trucking. Upon
23 information and belief, Mr. Van Den Berg may have knowledge regarding claims or
24 defenses pertaining to Otto Trucking in this case. Mr. Van Den Berg is
25 knowledgeable about aspects of personnel and staffing at Google's and Waymo's
26 autonomous driving projects including but not limited to knowledge of bonus
27 compensation plans and milestones. Mr. Van Den Berg is knowledgeable about
28 policies, procedures, and guidelines at Google and Waymo pertaining to the treatment

1 of confidential or proprietary information such as, but not limited to, encryption, data
2 recovery, data logging, intrusion, software, hardware, and the operation of servers,
3 networks, or electronic devices including the SVN network and Tortoise SVN.

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5 43. **George Lagui**—Mr. Lagui is associated with Otto Trucking. Upon information and
6 belief, Mr. Lagui may have knowledge regarding claims or defenses pertaining to
7 Otto Trucking in this case. Mr. Lagui is knowledgeable about aspects of personnel
8 and staffing at Google's and Waymo's autonomous driving projects including but not
9 limited to knowledge of bonus compensation plans and milestones. Mr. Lagui is
10 knowledgeable about policies, procedures, and guidelines at Google and Waymo
11 pertaining to the treatment of confidential or proprietary information such as, but not
12 limited to, encryption, data recovery, data logging, intrusion, software, hardware, and
13 the operation of servers, networks, or electronic devices including the SVN network
14 and Tortoise SVN.

15
16 44. **Benjamin Butin**—Mr. Butin is associated with Otto Trucking. Upon information
17 and belief, Mr. Butin may have knowledge regarding claims or defenses pertaining to
18 Otto Trucking in this case. Mr. Butin is knowledgeable about aspects of personnel
19 and staffing at Google's and Waymo's autonomous driving projects including but not
20 limited to knowledge of bonus compensation plans and milestones. Mr. Butin is
21 knowledgeable about policies, procedures, and guidelines at Google and Waymo
22 pertaining to the treatment of confidential or proprietary information such as, but not
23 limited to, encryption, data recovery, data logging, intrusion, software, hardware, and
24 the operation of servers, networks, or electronic devices including the SVN network
25 and Tortoise SVN.

26
27 45. **Daniel Ratner**—Mr. Ratner is associated with Otto Trucking. Upon information and
28 belief, Mr. Ratner may have knowledge regarding claims or defenses pertaining to

1 Otto Trucking in this case. Mr. Ratner is knowledgeable about aspects of personnel
2 and staffing at Google's and Waymo's autonomous driving projects including but not
3 limited to knowledge of bonus compensation plans and milestones. Mr. Ratner is
4 knowledgeable about policies, procedures, and guidelines at Google and Waymo
5 pertaining to the treatment of confidential or proprietary information such as, but not
6 limited to, encryption, data recovery, data logging, intrusion, software, hardware, and
7 the operation of servers, networks, or electronic devices including the SVN network
8 and Tortoise SVN.
9

10 46. **David Weikersdorfer**—Mr. Weikersdorfer is associated with Otto Trucking. Upon
11 information and belief, Mr. Weikersdorfer may have knowledge regarding claims or
12 defenses pertaining to Otto Trucking in this case. Mr. Weikersdorfer is
13 knowledgeable about aspects of personnel and staffing at Google's and Waymo's
14 autonomous driving projects including but not limited to knowledge of bonus
15 compensation plans and milestones. Mr. Weikersdorfer is knowledgeable about
16 policies, procedures, and guidelines at Google and Waymo pertaining to the treatment
17 of confidential or proprietary information such as, but not limited to, encryption, data
18 recovery, data logging, intrusion, software, hardware, and the operation of servers,
19 networks, or electronic devices including the SVN network and Tortoise SVN.
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22 47. **Abram Burkholder**—Mr. Burkholder is associated with Otto Trucking. Upon
23 information and belief, Mr. Burkholder may have knowledge regarding claims or
24 defenses pertaining to Otto Trucking in this case.

25 48. **Kevin Choi**—Mr. Choi is associated with Otto Trucking. Upon information and
26 belief, Mr. Choi may have knowledge regarding claims or defenses pertaining to Otto
27 Trucking in this case.
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1 49. **Sachin Patil**—Mr. Patil is associated with Otto Trucking. Upon information and
2 belief, Mr. Patil may have knowledge regarding claims or defenses pertaining to Otto
3 Trucking in this case.

4 50. **Eyal Cohen**—Mr. Cohen is associated with Otto Trucking. Upon information and
5 belief, Mr. Cohen may have knowledge regarding claims or defenses pertaining to
6 Otto Trucking in this case.

7 51. **Aaron Sellers**—Mr. Sellers is associated with Otto Trucking. Upon information and
8 belief, Mr. Sellers may have knowledge regarding claims or defenses pertaining to
9 Otto Trucking in this case.

10 52. **Harris Faruqi**—Mr. Faruqi is associated with Otto Trucking. Upon information and
11 belief, Mr. Faruqi may have knowledge regarding claims or defenses pertaining to
12 Otto Trucking in this case.

13 53. **Richard Blaver**—Mr. Blaver is associated with Otto Trucking. Upon information
14 and belief, Mr. Blaver may have knowledge regarding claims or defenses pertaining
15 to Otto Trucking in this case.

16 54. **Robert Miller**— contact through counsel for Uber – Mr. Miller is Senior Manager of
17 Self-Driving Operations at the Advanced Technologies Group at Uber. He was
18 previously associated with 510 Systems, Google, and Ottomotto. Upon information
19 and belief, Mr. Miller is knowledgeable about the development of LiDAR
20 technologies at Ottomotto, and Uber, and also has technical knowledge regarding
21 LiDAR, including aspects of LiDAR design, specifications, implementation, and
22 limitations. Further upon information and belief, Mr. Miller may have knowledge
23 regarding claims or defenses pertaining to Otto Trucking in this case.

24 55. **Seval Oz**—Ms. Oz was previously associated with Project Chauffeur at Google. She
25 is knowledgeable about circumstances relevant to claims or defenses pertaining to
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Waymo's trade secret misappropriation allegations. Further, Ms. Oz is knowledgeable about the policies or procedures regarding the treatment of proprietary or confidential information at Google.

56. **Chris Urmson**—Mr. Urmson was previously associated with Project Chauffeur at Google. He is knowledgeable about the circumstances relevant to claims or defenses pertaining to Waymo's trade secret misappropriation allegations. Further, Mr. Urmson is knowledgeable about the policies or procedures regarding the treatment of proprietary or confidential information at Waymo.

57. **Larry Page**— contact through counsel for Waymo – Mr. Page is Chief Executive Officer of Alphabet, Inc. ("Alphabet"). Mr. Page is knowledgeable about the development, strategic visions, designs, and projects of Google's autonomous car program at its inception and during the time period most relevant to the claims in this litigation. Further, he is knowledgeable about Google's acquisition of technologies related to the autonomous car program, including but not limited to LiDAR technologies. Mr. Page is knowledgeable about business and corporate aspects of Alphabet, Google, and Waymo, including but not limited to its business structures and corporate relationships. Mr. Page is knowledgeable about information pertaining to individuals sought, recruited, or hired in connection with Google/Waymo's autonomous driving project.

58. **Sergey Brin**— contact through counsel for Waymo – Mr. Brin is President of Alphabet. Mr. Brin is knowledgeable about the development, strategic visions, designs, and projects of Google's autonomous car program at its inception and during the time period most relevant to the claims in this litigation. Further, he is knowledgeable about Google's acquisition of technologies related to the autonomous car program, including but not limited to LiDAR technologies. Mr. Brin is

1 knowledgeable about business and corporate aspects of Alphabet, Google, and
2 Waymo, including but not limited to its business structures and corporate
3 relationships. Mr. Brin is knowledgeable about information pertaining to the
4 individuals sought, recruited, or hired in connection with Google/Waymo's
5 autonomous driving project.
6

7 59. **Eric Schmidt**— contact through counsel for Waymo – Mr. Schmidt is Executive
8 Chairman of Alphabet. Mr. Schmidt is knowledgeable about the development,
9 strategic visions, designs, and projects of Google's autonomous car program at its
10 inception and during the time period most relevant to the claims in this litigation.
11 Further, he is knowledgeable about Google's acquisition of technologies related to the
12 autonomous car program, including but not limited to LiDAR technologies. Mr.
13 Schmidt is knowledgeable about business and corporate aspects of Alphabet, Google,
14 and Waymo, including but not limited to its business structures and corporate
15 relationships. Mr. Schmidt is knowledgeable about information pertaining to the
16 individuals sought, recruited, or hired in connection with Google/Waymo's
17 autonomous driving project.
18

19 60. **John Krafcik**— contact through counsel for Waymo – Mr. Krafcik is Chief
20 Executive Officer of Waymo. Mr. Krafcik is knowledgeable about the development,
21 strategic visions, designs, and projects of Google's autonomous car program at its
22 inception and during the time period most relevant to the claims in this litigation.
23 Further, he is knowledgeable about Google's acquisition of technologies related to the
24 autonomous car program, including but not limited to LiDAR technologies. Mr.
25 Krafcik is knowledgeable about business and corporate aspects of Alphabet, Google,
26 and Waymo, including but not limited to its business structures and corporate
27 relationships. Mr. Krafcik is knowledgeable about information pertaining to the
28

1 individuals sought, recruited, or hired in connection with Google/Waymo's
2 autonomous driving project.

3 61. **Sebastian Thrun**—Mr. Thrun is Chairman and co-founder of Udacity. He was
4 previously associated with Google. Mr. Thrun is knowledgeable about the
5 development, strategic visions, designs, and projects of Google's autonomous car
6 program. Further, he is knowledgeable about Google's acquisition of technologies
7 related to the autonomous car program. Mr. Thrun is knowledgeable about business
8 and corporate aspects of Google, including but not limited to its business structures
9 and corporate relationships.
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11 62. **David Estrada**—Mr. Estrada is General Counsel of Kitty Hawk. He was previously
12 associated with Project Chauffeur, Google's autonomous driving project. Upon
13 information and belief, Mr. Estrada is knowledgeable about practices, policies, and
14 procedures regarding Project Chauffeur personnel. Further and upon information and
15 belief, Mr. Estrada is knowledgeable about business or corporate aspects of Project
16 Chauffeur, including but not limited to the Project's business structure and corporate
17 relationships, and agreements or contracts with third parties. Discovery will involve
18 some privileged documents and conversations.
19

20 63. **Nuro.ai**— 435 N Whisman Rd #100, Mountain View, CA 94043 – namely the
21 individuals Damien Weiss, Christine Marion, Jiajun Zhu, and David Ferguson—upon
22 information and belief have technical knowledge regarding autonomous driving
23 technology. Upon information and belief, the aforementioned individuals are
24 knowledgeable about the circumstances relevant to claims or defenses pertaining to
25 Waymo's trade secret misappropriation allegations.
26

27 64. **Individuals identified as inventors on the '922 patent**—namely Gaetan Pennecot;
28 Pierre-Yves Droz; Drew Eugene Ulrich; Daniel Gruver; Zachary Morriss; Anthony

1 Levandowski—are believed to have knowledge concerning the subject matter of these
2 patents, preparation and prosecution of the applications that led to these patents; and
3 prior art related to these patents. Given Mr. Levandowski’s invocation of his Fifth
4 Amendment rights, Otto Trucking does not anticipate that he will testify.
5

6 **65. Individuals identified as inventors on the ’464 patent**—namely Gaetan Pennecot;
7 Pierre-Yves Droz; Drew Eugene Ulrich; Daniel Gruver; Zachary Morriss; Anthony
8 Levandowski—are believed to have knowledge concerning the subject matter of these
9 patents, preparation and prosecution of the applications that led to these patents; and
10 prior art related to these patents. Given Mr. Levandowski’s invocation of his Fifth
11 Amendment rights, Otto Trucking does not anticipate that he will testify.
12

13 **66. Individuals identified as inventors on the ’936 patent**—namely Samuel William
14 Lenius and Pierre-Yves Droz—are believed to have knowledge concerning the
15 subject matter of these patents, preparation and prosecution of the applications that
16 led to these patents; and prior art related to these patents.

17 **67. Alejandro Munoz**— 2595 East Bayshore Road, Suite 200, Palo Alto, CA 94303,
18 650-752-1100. Mr. Munoz is counsel previously associated with Tyto LiDAR and
19 Odin Wave. He is knowledgeable about the patenting of certain Tyto LiDAR and
20 Odin Wave technologies. Discovery will involve some privileged documents and
21 conversations.
22

23 **68. Ognen Stojanovski**—Mr. Stojanovski was previously associated with Tyto LiDAR.
24 Upon information and belief, Mr. Stojanovski is knowledgeable about the
25 development of LiDAR technologies at Tyto LiDAR, and also has technical
26 knowledge regarding LiDAR, including aspects of LiDAR design, specifications,
27 implementation, and limitations. Further and upon information and belief, Mr.
28 Stojanovski is knowledgeable about business or corporate aspects of Tyto LiDAR,

1 including but not limited to its structure and aspects of Ottomotto's acquisition of
2 Tyto LiDAR.

3 Because discovery is still underway, Otto Trucking is not in a position to identify the current
4 or former employees, consultants, or agents of Waymo or other third parties who are likely to have
5 discoverable information that Otto Trucking may use to support its defenses. Otto Trucking
6 anticipates, however, that the following categories of current or former employees, consultants, or
7 agents of Waymo and other third parties may have discoverable information:
8

- 9 1. Individuals knowledgeable about Waymo's policy, procedure, or guidelines regarding the
10 access or maintenance of Waymo's SVN server, including but not limited to technology
11 support personnel, technology support experts, current and former employees of Waymo
12 may have relevant information that Otto Trucking may use to support its defenses;
13
- 14 2. Individuals who participated in Project Chauffeur, and including but not limited to
15 engineers, designers, business development personnel, and others involved in the
16 development of LiDAR technology that Waymo alleges to be trade secrets, may have
17 relevant information that Otto Trucking may use to support its defenses;
18
- 19 3. Individuals knowledgeable about work done by Mr. Levandowski or other members of
20 the Project Chauffeur team outside the scope of Project Chauffeur at the direction,
21 request, or insistence of Waymo executives, officers, or other managerial personnel may
22 have relevant information that Otto Trucking may use to support its defenses;
23
- 24 4. Individuals knowledgeable about LiDAR technology, specifications, designs,
25 implementations, and prior art who may have relevant information that Otto Trucking
26 may use to support its defenses;
27
- 28 5. Individuals knowledgeable about Ottomotto's supply chain regarding LiDAR
components, technologies, and designs proposed, considered, used, and implemented by

Ottomotto, who may have relevant information that Otto Trucking may use to support its defenses;

6. Individuals knowledgeable about any transfer of personnel and property, including any intellectual property, from Google or Alphabet on the one hand to Waymo on the other who may have relevant information that Otto Trucking may use to support its defenses;
7. Individuals knowledgeable about planning and implementation, including any preliminary discussions, regarding the Uber's acquisition of Ottomotto and Otto Trucking, whether such acquisition was realized or not realized, who may have relevant information that Otto Trucking may use to support its defenses;
8. Individuals knowledgeable about claims alleged by Waymo regarding the removal, copying, retention, duplication, or any other transfer, of intellectual property regarding LiDAR technology from Google or Waymo on the one hand to Uber, Ottomotto, or Otto Trucking on the other hand, who may have relevant information that Otto Trucking may use to support its defenses;
9. Individuals knowledgeable about damages, if any, incurred by Waymo in connection with its claims of patent infringement and trade secret misappropriation as alleged in the Amended Complaint filed March 10, 2017, who may have relevant information that Otto Trucking may use to support its defenses;
10. All individuals identified in Waymo's, Uber's, and Ottomotto's initial disclosures and any amendments or supplements thereto;
11. All individuals identified in Waymo's, Uber's, and Ottomotto's interrogatory responses and any amendments or supplements thereto;
12. All individuals referenced in deposition testimony; and
13. All other individuals not yet known or discoverable.

1 Otto Trucking reserves the right to disclose additional individuals whom Otto Trucking may
2 use to support its defenses based on information learned during the course of the litigation.

3 **B. CATEGORIES OF RELEVANT DOCUMENTS (Fed. R. Civ. P. 26(a)(1)(A)(ii))**

4 Pursuant to Rule 26(a)(1)(A)(ii), Otto Trucking identifies the following categories of
5 documents, data compilations, and tangible things that it may use to support its defenses.

- 6 1. Documents reflecting Waymo's policies, procedures, or guidelines regarding the access
7 or maintenance of Waymo's SVN server, and storage of data on Waymo's SVN server;
- 8 2. Access logs, records, and metadata regarding who had access to Waymo's SVN server
9 (the "Accessing Individual"), and each Accessing Individual's activities on the server
10 including but not limited to the Accessing Individual's read, write, edit, upload,
11 download, copy, and deletion activity;
- 12 3. Documents relating to any forensic investigation and analysis of computers, smartphones,
13 or other electronic devices used by Anthony Levandowski prior to his departure from
14 Waymo;
- 15 4. Documents pertaining to the specific LiDAR technology Waymo alleges to be trade
16 secrets, including but not limited to correspondence, memoranda, schematics, patenting
17 or licensing files, reports, logs, or other documents sufficient to describe the
18 development, content, and scope of the trade secret;
- 19 5. Documents pertaining to work done by Anthony Levandowski or other members of the
20 Project Chauffeur team outside the scope of Project Chauffeur at the direction, request, or
21 insistence of Waymo executives, officers, or other managerial personnel;
- 22 6. Documents sufficient to identify and support any damages Waymo alleges it suffered;
- 23 7. Documents pertaining to LiDAR technology, specifications, designs, implementations,
24 and prior art;
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- 1 8. Documents relevant to Ottomotto's supply chain regarding LiDAR components,
- 2 technologies, and designs proposed, considered, used, and implemented by Ottomotto;
- 3 9. Documents pertaining to any transfer of personnel and property, including any
- 4 intellectual property, from Google or Alphabet on the one hand to Waymo on the other;
- 5 10. Documents internal to any of Google's autonomous driving projects or to any of
- 6 Waymo's projects including and not limited to internal "wikis," intranet pages, and EEE
- 7 pages;
- 8 11. Documents pertaining to public disclosures of the trade secrets at issue in this case
- 9 including and not limited to presentations at trade shows, displays to the media, and
- 10 descriptions at conferences;
- 11 12. Documents regarding the relationship between Waymo on the one hand and Google and
- 12 Alphabet on the other, and also regarding Waymo's ownership of intellectual property
- 13 related to patents and trade secrets at issue in this case;
- 14 13. Documents pertaining to planning and implementation, including any preliminary
- 15 discussions, regarding the Uber's acquisition of Otto and OttoTrucking, whether such
- 16 acquisition was realized or not realized;
- 17 14. Documents shared by Waymo, Google, or Alphabet on the one hand, and any third party
- 18 or party or parties on the other;
- 19 15. Any documents to be produced by the parties, non-parties, and experts, or filed with the
- 20 courts, including exhibits; and
- 21 16. Any documents referenced in discovery;
- 22 17. Other documents not yet known or discoverable.
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Otto Trucking reserves the right to assert a claim of privilege or immunity and withhold from production any documents, whether or not included above, that are protected from discovery by the attorney-client privilege, work product immunity, or any other privilege or immunity. Otto Trucking

1 further reserves the right to disclose additional documents that Otto Trucking may use to support its
2 defenses based on information learned during the course of this litigation.

3 It is Otto Trucking's current understanding that the documents described in categories 1–17
4 above are currently either in Waymo's possession, custody, or control or publicly available.

5
6 **C. COMPUTATION OF DAMAGES (Fed. R. Civ. P. 26(a)(1)(A)(iii))**

7 Otto Trucking discloses that, at this point, it does not maintain any claim for damages in this
8 action, and thus Rule 26(a)(1)(A)(iii) is presently inapplicable. Otto Trucking reserves the right to
9 seek attorney fees and costs incurred in prosecuting this action as permitted by law and will provide
10 information concerning such fees and costs at the appropriate time.

11 **D. INSURANCE AGREEMENTS (Fed. R. Civ. P. 26(a)(1)(A)(iv))**

12 Otto Trucking is unaware of any applicable insurance agreement. Otto Trucking reserves the
13 right to supplement these initial disclosures pursuant to Federal Rule of Civil Procedure 26(e).
14

15
16 Dated: June 21, 2017

Respectfully submitted,

17 By: /s/ Neel Chatterjee

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